

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

SECURITYSCORECARD, INC.,

Plaintiff,

-against-

SAFE SECURITIES, INC. d/b/a SAFE
SECURITY and MARY POLYAKOVA,

Defendants.

Case No. 24-cv-04240

**DECLARATION OF KENNETH
W. TABER**

I, Kenneth W. Taber, declare under penalty of perjury that the following statements are true and correct:

1. I am a member of the Bar of this Court and a Partner of Pillsbury Winthrop Shaw Pittman LLP, attorneys for Plaintiff SecurityScorecard, Inc. (“SSC”).

2. I submit this Declaration in support of SSC’s Renewed Order to Show Cause for Preliminary Injunction (“Order to Show Cause”), seeking an Order temporarily and, for the pendency of this litigation, preliminarily, (i) enjoining Defendant Safe Securities, Inc. *d/b/a* Safe Security (“SAFE”), and all persons acting in concert with or through SAFE who receive actual notice of the injunction, from accessing SSC’s cybersecurity ratings customer platform (“Platform”); and (ii) enjoining SAFE, and all persons acting in concert with or through SAFE who receive actual notice of the injunction, from disclosing or using any confidential information it has already obtained from the Platform.

3. Attached hereto as **Exhibit A** is a true and correct copy of the transcript from the June 13, 2024 hearing before this Court on SSC’s initial Order to Show Cause for Preliminary Injunction.

4. This application is being brought by Order to Show Cause rather than by Notice of Motion because, as detailed in the accompanying papers, swift action is required to prevent SAFE from irreparably injuring SSC's business.

5. SSC is concurrently informing SAFE that it is filing this Order to Show Cause seeking injunctive relief, and is concurrently forwarding copies of all papers in support of this Order to Show Cause by email to SAFE's counsel of record as soon as they are filed.

6. There has been one prior request for the relief requested in this Order to Show Cause. *See* Dkts. 10-14. That prior request was denied, without prejudice, subject to SSC providing the Court with "additional information concern[ing] the intrusion by [SAFE] and its proxies into [SSC's] databases." *See* Ex. A at 78:18-79:4, 79:23-80:1. This Order to Show Cause, and in particular the papers submitted in support thereof, provide that additional information.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 26, 2024

/s/ Kenneth W. Taber
Kenneth W. Taber